

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, et al.,	)	
	)	
	)	
	)	
Plaintiffs,	)	
	)	Civil Action No.
v.	)	
	)	1:17-cv-02989-AT
BRAD RAFFENSPERGER, et al.	)	
	)	
	)	
Defendants.	)	

**NOTICE OF DEPOSITION OF JOSEPH KIRK**

To: **Joseph Kirk**, by and through his counsel, Jayson Phillips, Talley,  
Richardson & Cable P.A., 367 West Memorial Drive, Post Office Box 197,  
Dallas, Georgia 30132

PLEASE TAKE NOTICE that Plaintiffs Coalition for Good Governance,  
Laura Digges, William Digges III, Ricardo Davis, and Megan Missett will take the  
deposition by oral examination of Joseph Kirk as permitted by Rule 30 of the  
Federal Rules of Civil Procedure and applicable court orders in the above-  
captioned lawsuit. The deposition will take place on Thursday, **July 11, 2019**,  
beginning at **9:30 a.m.**, and continue from day to day until completed, at the Frank  
Moore Administration & Judicial Center, 135 West Cherokee Avenue,  
Cartersville, GA 30120. The deposition shall be taken before an officer authorized



by law to administer oaths and take testimony and will be recorded by stenographic and/or video means.

Dated: July 2, 2019

/s/ Bruce P. Brown  
Bruce P. Brown  
Georgia Bar No. 064460  
bbrown@brucepbrownlaw.com  
Bruce P. Brown Law LLC  
1123 Zonolite Rd. NE  
Suite 6  
Atlanta, Georgia 30306  
(404) 881-0700

*Attorney for Plaintiff Coalition for Good Governance*

/s/ John Powers  
John Powers, Esq.\*  
David Brody, Esq.\*  
jpowers@lawyerscommittee.org  
dbrody@lawyerscommittee.org  
Lawyers' Committee for Civil Rights  
Under Law  
1500 K Street NW, Suite 900  
Washington, D.C. 20005  
Telephone: (202) 662-8600  
Facsimile: (202) 783-0857

*Attorneys for Plaintiffs Coalition for Good Governance, William Digges III, Laura Digges, Ricardo Davis, and Megan Missett*

Cary Ichter  
Georgia Bar No. 382515  
cichter@IchterDavis.com  
Ichter Davis, LLC  
3340 Peachtree Road NE

Suite 1530  
Atlanta, GA 30326  
Tel.: 404.869.5243  
Fax: 404.869.7610

*Attorney for William Digges III, Laura  
Digges, Ricardo Davis, and Megan Missett*

Robert A. McGuire, III  
Admitted Pro Hac Vice (ECF No. 125)  
ROBERT MCGUIRE LAW FIRM  
2703 Jahn Ave NW, Suite C-7  
Gig Harbor, WA 98335  
T: (844) 318-6730

*Attorney for Plaintiff Coalition for Good  
Governance*

**CERTIFICATE OF SERVICE**

I certify that on July 2, 2019, the foregoing was served by e-mail on Mr. Phillips and by the ECF/CMF system on all counsel of record.

/s/ John Powers

Lawyers' Committee for Civil Rights Under Law